

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

Fond Du Lac Bumper Exchange, Inc., and Roberts Wholesale Body Parts, Inc. on Behalf of Themselves and Others Similarly Situated,

Case No. 2:09-cv-00852-LA

Plaintiffs,

v.

Jui Li Enterprise Company, Ltd., et al.,

Defendants.

**NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF  
DIRECT PURCHASER PLAINTIFFS' SETTLEMENT WITH  
TONG YANG INDUSTRY CO., LTD. AND TYG PRODUCTS, LP**

**TO THE COURT AND DEFENDANTS AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that Direct Purchaser Plaintiffs (“DPPs”) will, and hereby do, move this Court for an order (1) granting preliminary approval of a settlement (the “Settlement”) with Tong Yang Industry Co., Ltd., as successor in interest to Taiwan Kai Yih Industrial Co. Ltd. and TYG Products LP; (2) certifying a settlement class (the “Settlement Class”); (3) appointing Fond du Lac Bumper Exchange, Inc. and Roberts Wholesale Body Parts, Inc. as the Settlement Class Representatives; (4) appointing Interim Co-Lead Counsel and Interim Liaison Counsel as Co-Lead Settlement Class Counsel and Liaison Settlement Class Counsel, respectively; (5) directing dissemination of notice of the Settlement to the members of the Settlement Class to give them the opportunity to exclude themselves from the class or object to the Settlement; and (6) setting a schedule for final approval of the Settlement.

This motion is made on the grounds that the Settlement is within the range of possible approval sufficient to justify sending notice of the Settlement to the Settlement Class and holding a hearing to determine whether the Court should grant final approval of the Settlement.

This motion is based on the accompanying Memorandum in Support of Direct Purchaser Plaintiffs' Motion for Preliminary Approval of Settlement with Tong Yang Industry Co., Ltd., and TYG Products, LP and supporting declarations of Jason S. Hartley and Carla A. Peak, and on any documentary evidence that may be presented at hearing on this motion.

Dated: March 24, 2015

Respectfully submitted,

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